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Company*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, for the use  
and benefit of SUSTAINABLE MODULAR  
MANAGEMENT, INC., a Texas corporation,

Plaintiff,

vs.

JE DUNN CONSTRUCTION  
COMPANY; FEDERAL INSURANCE  
COMPANY; HARTFORD FIRE  
INSURANCE COMPANY; TRAVELERS  
CASUALTY AND SURETY COMPANY  
OF AMERICA; DOE Individuals I-X and  
ROE Entities I-X, inclusive,

Defendants.

Case No.: 2:20-cv-00790-JAD-NJK

Compl. Filed: May 1, 2020

**STIPULATION TO EXTEND  
ALL DEFENDANTS' TIME TO  
RESPOND TO COMPLAINT**

**(SECOND REQUEST)**

This Stipulation to Extend all Defendants' Time to Respond to Complaint is made  
by and between Plaintiff United States of America, for the use and benefit of Sustainable  
Modular Management, Inc. ("Plaintiff") and Defendant JE Dunn Construction Company  
("JE Dunn") through their respective counsel, in light of the following facts:

**RECITALS**

A. Plaintiff filed the Complaint ("Complaint") against JE Dunn on or about  
May 1, 2020.

1 B. Pursuant to the first Stipulation and Order to Extend All Defendants' Time  
2 to Respond to Complaint, the current deadline for all defendants to respond to the  
3 Complaint is June 17, 2020.

4 C. The parties agreed that JE Dunn shall have until June 26, 2020, to respond  
5 to the Complaint to give JE Dunn time to investigate Plaintiff's claims and prepare a  
6 proper response. Counsel for JE Dunn is still coordinating with the other defendants to  
7 represent all and provide a single response to SMM's Complaint. The parties agreed that  
8 the additional time will allow Defendants to finalize these arrangements so that individual  
9 answers may not be required. Accordingly, the parties further agree that the deadline for  
10 all Defendants to respond to the Complaint will be June 26, 2020.

11 D. There is good cause to grant this stipulation because JE Dunn requires  
12 additional time to investigate Plaintiff's claims, prepare a proper response on behalf of JE  
13 Dunn and the remaining Defendants.

14 E. This stipulation is filed in good faith and not intended to cause delay.

15 F. Pursuant to Local Rule IA 6-2, Plaintiff and JE Dunn respectfully request  
16 that the Court extend all Defendants' time to respond to Plaintiff's Complaint through  
17 June 26, 2020.

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**STIPULATION**

NOW, THEREFORE, Plaintiff and JE Dunn hereby stipulate and agree that JE Dunn and all Defendants have up to and including June 26, 2020, to file a response to Plaintiff's Complaint.

**IT IS SO STIPULATED.**

DATED this 17<sup>th</sup> day of June, 2020.

DATED this 17<sup>th</sup> day of June, 2020.

**MORRIS LAW GROUP**

**LEWIS ROCA ROTHGERBER  
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*Attorneys for Defendant  
JE Dunn Construction Company*

*Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED.

  
\_\_\_\_\_  
United States Magistrate Judge

DATED June 18, 2020

3993 Howard Hughes Pkwy, Suite 600  
Las Vegas, NV 89169-5996

**Lewis Roca**  
**ROTHGERBER CHRISTIE**